

Wildlife hazing is not generally directly conducted by an OSRO nor the responsible party for an oil spill. Hazing is generally conducted and overseen by wildlife experts under the direction of the unified command. It may be inappropriate for Chevron to develop procedures for an activity that would be handled by others in the event of a spill. In California expert oiled bird rehabilitation is provided through the Oiled Wildlife Care Network that operates under the direction of the unified command.

27-4

**BIO-6d:** Chevron shall ensure that adequate equipment and personnel are available to protect the Castro Creek marshes, San Pablo Creek marshes, Pinole Pt. marshes and the southeastern San Pablo Bay mudflats within 8 hours of a spill at the Long Wharf. The strategy to protect each of these sensitive resources shall be tested with a field demonstration of deployment and placement of booms and other equipment in locations designated in the Area Contingency Plan to protect these sensitive habitats.

As discussed in my comments to BIO-6b MSRC maintains a sufficient inventory of boom and response resources to protect the sensitive sites listed, in accordance with the planning parameters established by OSPR. It is not possible to represent that all of these sensitive sites protection strategies can be deployed in 8 hours. For example, our number one priority in any response or exercise is safety. Adverse conditions including winds, tides, and currents can impact responder's ability to safely deploy equipment. As such there can be no warranty given that protection strategies can be deployed in rigid timeframes. Furthermore, decisions regarding when, and in what priority, sensitive sites might be protected would be made by Unified Command in the event of a significant spill; that decision might not include the sites named above due to a number of different considerations.

27-5

As mentioned in my comments on BIO-6b MSRC participates in the Area Committee's sensitive site evaluation program. Sites to be evaluated are selected by the Area Committee based on site sensitivity, location, and other factors. This is an on-going program that aims to test many of the sensitive sites in the Bay Area. Again there is an established protocol that must be followed prior to actual field testing. OSRO's and plan holders have been advised that sensitive site protection deployment exercises should not be conducted without following the OSPR directed protocol.

## **Response to Comment Set #27**

27-1: OS-4

Please refer to response to Comment 37-11.

27-2: OS-7b

Please refer to response to Comment 37-16.

27-3: BIO-6b

Please refer to response to Comment 37-28.

27-4: BIO-6c

Please refer to response to Comment 37-29.

27-5: BIO-6d

Please refer to response to Comment 37-30.